

Exhibit E

(previously filed as Dkt. 647-5)

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

-----:
UNITED STATES, et al., :
:
Plaintiff, :
:
vs. : Case No.:
: 1:23-CV-00108-LMB-JFA
GOOGLE, LLC, :
:
Defendant. :
-----:

CONFIDENTIAL VIDEOTAPED DEPOSITION OF ADORIA LIM

DATE: February 29, 2024
TIME: 9:37 a.m.
LOCATION: U.S. Department of Justice
Antitrust Division
450 Fifth Street, Northwest
Washington, D.C. 20530

REPORTED BY: Shari R. Broussard, RPR, CSR
Reporter, Notary
Job No. CS6485261

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<p style="text-align: right;">Page 62</p> <p>1 between DV360, 3P DSPs, and Google Ads on the left</p> <p>2 side and FAAs in the blue bubble on the right</p> <p>3 side?</p> <p>4 MR. BRISKIN: Objection to form.</p> <p>5 THE WITNESS: I guess I'm just not</p> <p>6 following your question. The -- I hadn't thought</p> <p>7 about it that way. The way I think about it is</p> <p>8 that the FAAs purchase the services from Google</p> <p>9 and -- and that's what -- that's what is conveyed</p> <p>10 in Figure 3.</p> <p>11 BY MS. GOODMAN:</p> <p>12 Q So you don't have an opinion one way or</p> <p>13 another whether it would be accurate to put the ad</p> <p>14 agencies in between the DV360, 3P DSPs, and Google</p> <p>15 Ads on the left side and the FAA bubble on the</p> <p>16 right side?</p> <p>17 MR. BRISKIN: Objection to form.</p> <p>18 THE WITNESS: I think if you're asking</p> <p>19 if I were to do a diagram of the purchase pathways</p> <p>20 with regard to the payment flows, then -- I mean,</p> <p>21 could one draw -- draw a diagram in such a way</p> <p>22 that you could insert -- or you could put circles</p>	<p style="text-align: right;">Page 64</p> <p>1 Q Okay.</p> <p>2 A It shows the FAAs purchasing services</p> <p>3 from Google.</p> <p>4 Q Is there a difference in your report</p> <p>5 between what you call a purchasing avenue and a</p> <p>6 purchase pathway?</p> <p>7 A The purchase pathway is a very defined</p> <p>8 term in my report. I don't think the purchase</p> <p>9 avenues -- I think I use that rather loosely.</p> <p>10 Q Okay. So if we were to retitle Figure 3</p> <p>11 "Illustration of FAAs' Purchasing Pathways," you</p> <p>12 would need to include the advertising agencies in</p> <p>13 this diagram, correct?</p> <p>14 MR. BRISKIN: Objection to form.</p> <p>15 THE WITNESS: I -- honestly I hadn't</p> <p>16 thought about it, so I mean I --</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q I'm asking you to think about it here.</p> <p>19 A I haven't thought about it. I don't --</p> <p>20 I don't know how I would draw that.</p> <p>21 Q Okay. Let's look at Figure 4. The</p> <p>22 purchasing is -- this Figure 4 is titled "Purchase</p>
<p style="text-align: right;">Page 63</p> <p>1 in between -- if you had a string of circles -- I</p> <p>2 mean, you could choose to draw the diagram however</p> <p>3 you want. You could -- you could put the circles</p> <p>4 there, you could -- I'm not sure I understand your</p> <p>5 question.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q Does diagram -- or does Figure 3 leave</p> <p>8 out a step in the purchasing pathway for the FAAs?</p> <p>9 MR. BRISKIN: Objection to form.</p> <p>10 THE WITNESS: Diagram 3 shows that the</p> <p>11 FAAs purchased services from Google.</p> <p>12 BY MS. GOODMAN:</p> <p>13 Q Does it leave out a step --</p> <p>14 MR. BRISKIN: Objection to form.</p> <p>15 BY MS. GOODMAN:</p> <p>16 Q -- of your purchasing pathways?</p> <p>17 MR. BRISKIN: Sorry. Objection to form.</p> <p>18 THE WITNESS: I'm -- I'm not sure what</p> <p>19 you mean by the question. I don't think it</p> <p>20 leaves -- I don't think Figure 3 leaves out any</p> <p>21 steps.</p> <p>22 BY MS. GOODMAN:</p>	<p style="text-align: right;">Page 65</p> <p>1 Avenues Included in Damages Analysis."</p> <p>2 Do you see that?</p> <p>3 A I do.</p> <p>4 Q And the purchase avenues included in the</p> <p>5 damages analysis are the 15 defined purchase</p> <p>6 pathways, correct?</p> <p>7 MR. BRISKIN: Objection to form.</p> <p>8 THE WITNESS: One more time, please.</p> <p>9 BY MS. GOODMAN:</p> <p>10 Q The purchase avenues included in your</p> <p>11 damages analysis are the 15 defined purchasing</p> <p>12 pathways set out in Figures 8, 9, and 10, correct?</p> <p>13 A That's not the way I would --</p> <p>14 MR. BRISKIN: Objection.</p> <p>15 THE WITNESS: -- phrase it.</p> <p>16 BY MS. GOODMAN:</p> <p>17 Q Okay. Your damages analysis includes 15</p> <p>18 defined purchase pathways, correct?</p> <p>19 A That's correct.</p> <p>20 Q And what is the difference between those</p> <p>21 15 defined purchase pathways and what you describe</p> <p>22 in Figure 4 as the "FAA Purchase Avenues Included</p>

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<p style="text-align: right;">Page 66</p> <p>1 in Damages Analysis"?</p> <p>2 A The -- the avenues are the red lines</p> <p>3 or -- or, sorry, the FAA purchase avenues are the</p> <p>4 red arrows shown in Figure 4 and the FAA purchase</p> <p>5 pathways are a subset of the red avenues.</p> <p>6 Q Okay. Did you see any evidence --</p> <p>7 withdrawn.</p> <p>8 And so would it be accurate to put in</p> <p>9 between the left-hand side of DV360, TTD, other</p> <p>10 DSPs, and Google Ads and the right-hand side blue</p> <p>11 bubble FAAs the advertising agencies through which</p> <p>12 FAAs purchase ads?</p> <p>13 MR. BRISKIN: Objection to form.</p> <p>14 THE WITNESS: I think this question was</p> <p>15 similar to the previous question you asked me</p> <p>16 before. Figure 3 just is different from -- I'm</p> <p>17 sorry, Figure 4 is different from Figure 3 in that</p> <p>18 it breaks out more binders and it shows the red</p> <p>19 arrows, which are the FAA purchase pathways, of</p> <p>20 which the -- sorry, it shows the red arrows, which</p> <p>21 are the FAA purchase avenues, of which the FAA</p> <p>22 purchase pathways are a -- are a subset. So that</p>	<p style="text-align: right;">Page 68</p> <p>1 yourself and Mr. Chu. That's what I mean.</p> <p>2 Imagine yourself to be an FAA and Mr. Chu being</p> <p>3 Google.</p> <p>4 Is there any other entity between the</p> <p>5 FAA and Google in the course of purchasing ads</p> <p>6 that you saw?</p> <p>7 MR. BRISKIN: Objection to form.</p> <p>8 THE WITNESS: So I'm not -- sorry, I'm</p> <p>9 not -- I'm not sure the -- the seating -- the</p> <p>10 hypothetical -- or it's not hypothetical, but the</p> <p>11 seating diagram really helps me understand your</p> <p>12 question.</p> <p>13 Again, the FAAs and -- the FAAs</p> <p>14 purchased display advertising from Google and, as</p> <p>15 I testified earlier, that the FAAs used ad</p> <p>16 agencies to do so.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q Okay. And by using the ad agencies to</p> <p>19 do so, is it accurate that the ad agencies sit</p> <p>20 between the FAAs and Google?</p> <p>21 MR. BRISKIN: Objection to form.</p> <p>22 THE WITNESS: Again, I'm not sure what</p>
<p style="text-align: right;">Page 67</p> <p>1 I -- I -- I -- I think you're asking a very</p> <p>2 similar question with regard to Figure 3 and</p> <p>3 Figure 4. I don't -- I would have the same</p> <p>4 answer.</p> <p>5 BY MS. GOODMAN:</p> <p>6 Q Okay. And it's accurate that the FAAs</p> <p>7 purchased display ads from Google using various ad</p> <p>8 agencies, correct?</p> <p>9 A Yes.</p> <p>10 Q Did you see any evidence that FAAs</p> <p>11 purchased display ads directly from Google?</p> <p>12 MR. BRISKIN: Objection to form.</p> <p>13 THE WITNESS: Could you clarify what you</p> <p>14 mean by "directly"?</p> <p>15 BY MS. GOODMAN:</p> <p>16 Q With no other entity sitting in between</p> <p>17 the FAA and Google.</p> <p>18 MR. BRISKIN: Objection to form.</p> <p>19 THE WITNESS: What -- what do you -- can</p> <p>20 you clarify what you mean by "sitting in between"?</p> <p>21 BY MS. GOODMAN:</p> <p>22 Q Well, Mr. Briskin is sitting in between</p>	<p style="text-align: right;">Page 69</p> <p>1 you mean by "sit between."</p> <p>2 BY MS. GOODMAN:</p> <p>3 Q So you can't answer the question?</p> <p>4 A I think you'd have to clarify it for me.</p> <p>5 Q Okay. What's your understanding of the</p> <p>6 word "directly"?</p> <p>7 MR. BRISKIN: Objection to form.</p> <p>8 THE WITNESS: I -- I -- it depends on</p> <p>9 the context.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q Can you give me a dictionary definition</p> <p>12 of the word "directly"?</p> <p>13 A Probably not without the dictionary.</p> <p>14 Q Okay.</p> <p>15 A I'm sorry, just -- I -- I wasn't</p> <p>16 prepared on dictionary definitions today.</p> <p>17 Q Okay. Did you see any evidence that the</p> <p>18 FAAs paid money directly to Google?</p> <p>19 MR. BRISKIN: Objection to form.</p> <p>20 THE WITNESS: Again, can you clarify</p> <p>21 what you mean by "directly"?</p> <p>22 BY MS. GOODMAN:</p>

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<p style="text-align: right;">Page 70</p> <p>1 Q Dollars went from an FAA directly to</p> <p>2 Google.</p> <p>3 MR. BRISKIN: Objection to form.</p> <p>4 THE WITNESS: So let me -- let me -- let</p> <p>5 me state it this way: So what I saw in the</p> <p>6 payment process was that Google invoiced the --</p> <p>7 Google invoiced the ad agencies and the ad</p> <p>8 agencies invoiced the FAAs and the FAAs paid</p> <p>9 100 percent of the charges invoiced by Google.</p> <p>10 VIDEO TECHNICIAN: Sorry, ma'am, it</p> <p>11 picks up when you're touching the microphone.</p> <p>12 THE WITNESS: Oh, sorry. I've probably</p> <p>13 just got a nervous habit there. Apologies. Do I</p> <p>14 need to say that again?</p> <p>15 VIDEO TECHNICIAN: No, you're fine.</p> <p>16 THE WITNESS: Okay.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q And so in what you saw, if I'm</p> <p>19 understanding you correctly, Google invoiced the</p> <p>20 ad agencies and the ad agencies invoiced the FAAs,</p> <p>21 correct?</p> <p>22 A Yes.</p>	<p style="text-align: right;">Page 72</p> <p>1 A I'm -- I'm -- I'm trying to actually</p> <p>2 understand what you mean by the difference between</p> <p>3 payment and purchase because you -- you asked a</p> <p>4 question about purchase, you asked a question</p> <p>5 about -- and I clarified with regard to payment.</p> <p>6 And -- and so if you could clarify what you mean</p> <p>7 by "purchase."</p> <p>8 Q I want to use --</p> <p>9 A I don't want to have a</p> <p>10 misunderstanding --</p> <p>11 Q I agree.</p> <p>12 A -- between the two of us.</p> <p>13 Q I agree.</p> <p>14 You used the word "purchase" throughout</p> <p>15 your report, so I want to use your understanding</p> <p>16 of purchase and I want to use your understanding</p> <p>17 of payment, which is also in your report.</p> <p>18 So please tell me what you understand to</p> <p>19 mean the difference between those two words as</p> <p>20 used in your report and we will have that common</p> <p>21 understanding.</p> <p>22 A So as I testified earlier, my</p>
<p style="text-align: right;">Page 71</p> <p>1 Q Okay. And so in what you saw, can we</p> <p>2 have the common understanding that the ad</p> <p>3 agencies, therefore, sit between Google and the</p> <p>4 FAAs?</p> <p>5 MR. BRISKIN: Objection to form.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q That's what I mean by "sit between."</p> <p>8 Okay?</p> <p>9 A Are you referring to the payment process</p> <p>10 specifically when you refer to -- to "sit</p> <p>11 between"?</p> <p>12 Q I'm referring to both the payment and</p> <p>13 purchasing process.</p> <p>14 MR. BRISKIN: Objection to form.</p> <p>15 THE WITNESS: I reviewed the -- I</p> <p>16 reviewed the payment process.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q Did you review the purchasing process?</p> <p>19 A What do you mean by "purchasing</p> <p>20 process"?</p> <p>21 Q What's your understanding of the</p> <p>22 difference between payment and purchase?</p>	<p style="text-align: right;">Page 73</p> <p>1 understanding is that based on what I saw, the</p> <p>2 FAAs purchased an advertising from Google. With</p> <p>3 regard to the payment flow process specifically,</p> <p>4 Google invoiced the ad agencies and the ad</p> <p>5 agencies invoiced the FAAs and the payments</p> <p>6 reflect the invoiced parties.</p> <p>7 MS. GOODMAN: Move to strike as not</p> <p>8 responsive.</p> <p>9 BY MS. GOODMAN:</p> <p>10 Q My question to you is simply what do you</p> <p>11 understand the difference in meaning of the words</p> <p>12 "payment" and "purchase" to be in your report?</p> <p>13 A Purchase in my mind is who is -- it's</p> <p>14 who is -- it's -- it's the advertiser buying the</p> <p>15 ad inventory. Payment refers, in -- in my mind,</p> <p>16 to the physical flow of funds.</p> <p>17 Q Okay. So did you see any evidence that</p> <p>18 an FAA buys ad inventory directly from Google?</p> <p>19 MR. BRISKIN: Objection to form.</p> <p>20 THE WITNESS: As I stated earlier,</p> <p>21 the -- the FAAs purchased advertising from -- they</p> <p>22 purchased services from Google.</p>

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<p>1 BY MS. GOODMAN:</p> <p>2 Q Yes.</p> <p>3 A I'm not -- I'm not -- again, I'm not</p> <p>4 sure what you mean by "directly." I think I've --</p> <p>5 I think I've stated my understanding of both</p> <p>6 the -- of who's doing the purchasing and who's</p> <p>7 doing the paying in terms of the payment flow</p> <p>8 process.</p> <p>9 Q It is accurate that some of the ad</p> <p>10 agencies used by FAAs engaged other ad agencies to</p> <p>11 execute the FAAs' ad purchases, correct?</p> <p>12 A Yes.</p> <p>13 MR. BRISKIN: Can we take a break in the</p> <p>14 next five minutes, whenever it's a good breaking</p> <p>15 point?</p> <p>16 MS. GOODMAN: Yeah.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q Ms. Lim, did you see any evidence of an</p> <p>19 FAA buying ad inventory without the use of an</p> <p>20 advertising agency?</p> <p>21 A It's possible that that happened. I was</p> <p>22 asked to focus my damages analysis -- or</p>	<p>1 of those pathways the FAAs use ad agencies to make</p> <p>2 their purchases.</p> <p>3 Q And so it's accurate that, for purposes</p> <p>4 of the damages which you calculate in this case,</p> <p>5 there is no instance of an FAA buying ad inventory</p> <p>6 without the use of an advertising agency?</p> <p>7 A Yes.</p> <p>8 MS. GOODMAN: We can take a break.</p> <p>9 MR. BRISKIN: Thanks.</p> <p>10 VIDEO TECHNICIAN: Off the record at</p> <p>11 11:38.</p> <p>12 (Brief recess.)</p> <p>13 VIDEO TECHNICIAN: Back on the record at</p> <p>14 11:53.</p> <p>15 BY MS. GOODMAN:</p> <p>16 Q Ms. Lim, if you could turn to Exhibit 1,</p> <p>17 Appendix E, paragraph 44.</p> <p>18 A On page 17?</p> <p>19 Q Yes.</p> <p>20 A I'm there.</p> <p>21 Q The first sentence reads, "The FAAs</p> <p>22 purchased display ads from Google using various ad</p>
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<p>1 Dr. Respass was asked to focus his damages</p> <p>2 analysis on the specific F- -- FAA purchase</p> <p>3 pathways in the -- in the Respass report.</p> <p>4 In -- in those pathways the FAAs used ad</p> <p>5 agencies to make their purchases of Google</p> <p>6 services, but it's -- it's -- it's possible that</p> <p>7 I -- I -- so, for example, what I'm -- let me</p> <p>8 just -- what I'm thinking about is, as I mentioned</p> <p>9 in my report, there are a number of blank agency</p> <p>10 IDs and I don't know in those circumstances</p> <p>11 where -- whether an ad agency was involved or not</p> <p>12 and I -- I can't recall -- no, no. Sorry. Strike</p> <p>13 that. I do recall that there are FAAs associated</p> <p>14 with those blank agency IDs.</p> <p>15 Q Okay. So for each of the 15 purchase</p> <p>16 pathways included in your damages analysis, did</p> <p>17 you see any evidence of any of the FAAs within</p> <p>18 those purchase pathways buying ad inventory</p> <p>19 without the use of an advertising agency?</p> <p>20 A By definition, those purchase pathways</p> <p>21 are as I've described them in Figures 8 through 10</p> <p>22 of the opening report and each of those -- in each</p>	<p>1 agencies."</p> <p>2 Do you see that?</p> <p>3 A Yes.</p> <p>4 Q For purposes of your damages</p> <p>5 computation, did you see any evidence that any FAA</p> <p>6 directed the advertising agency to purchase ads</p> <p>7 using Google products or services?</p> <p>8 MR. BRISKIN: Objection to form.</p> <p>9 THE WITNESS: I'm not sure what you mean</p> <p>10 by "directed."</p> <p>11 BY MS. GOODMAN:</p> <p>12 Q Did you see any evidence that any FAA</p> <p>13 told their advertising agency please purchase ads</p> <p>14 using Google products or services?</p> <p>15 MR. BRISKIN: Objection to form.</p> <p>16 THE WITNESS: I wasn't -- I was focused</p> <p>17 on the payment flow process, so I -- and I -- let</p> <p>18 me -- let me start over.</p> <p>19 So in the course of my work -- work, as</p> <p>20 I mentioned before, I reviewed probably</p> <p>21 thousands -- probably thousands of -- of documents</p> <p>22 in this matter and I don't recall the contents of</p>

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<p style="text-align: right;">Page 78</p> <p>1 each and every one of those. What I -- what I</p> <p>2 focused on was the payment flow process.</p> <p>3 So with regard to your question, I</p> <p>4 think -- I think my answer is I don't know. I</p> <p>5 don't -- I don't remember.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q Okay. So with regard to my question,</p> <p>8 you don't remember whether you saw any evidence</p> <p>9 that any FAA directed their advertising agency to</p> <p>10 use Google products or services to purchase ads;</p> <p>11 is that accurate?</p> <p>12 A I think --</p> <p>13 MR. BRISKIN: Objection to form.</p> <p>14 THE WITNESS: I think you modified your</p> <p>15 question to say -- when you clarified, you said</p> <p>16 did I see any evidence that an FAA had told an ad</p> <p>17 agency. And if -- if -- if that's how you're --</p> <p>18 what you mean by "directed," I don't recall one</p> <p>19 way or the other.</p> <p>20 BY MS. GOODMAN:</p> <p>21 Q Okay. That is what I mean by</p> <p>22 "directed."</p>	<p style="text-align: right;">Page 80</p> <p>1 THE WITNESS: What do you mean by</p> <p>2 "instructed"? Do you mean told again?</p> <p>3 BY MS. GOODMAN:</p> <p>4 Q What do you understand the word</p> <p>5 "instructed" to mean?</p> <p>6 A It depends on the context.</p> <p>7 Q In the context of my sentence, how do</p> <p>8 you interpret it?</p> <p>9 A I think that's what I'm asking you,</p> <p>10 if -- if you're -- if you mean told.</p> <p>11 Q I just want to understand how you</p> <p>12 under- -- how you interpret the word "instructed"</p> <p>13 in my question.</p> <p>14 What do you think I mean?</p> <p>15 Let me withdraw that.</p> <p>16 What do you understand the word</p> <p>17 "instructed" to mean in my question?</p> <p>18 A Told.</p> <p>19 Q Okay. Did you see any evidence in this</p> <p>20 case that any FAA instructed their advertising</p> <p>21 agency to use Google products or services to</p> <p>22 purchase ads?</p>
<p style="text-align: right;">Page 79</p> <p>1 So with regard to my question, you don't</p> <p>2 remember whether you saw any evidence that any FAA</p> <p>3 directed their advertising agency to use Google</p> <p>4 products or services to purchase -- to purchase</p> <p>5 ads; is that correct?</p> <p>6 MR. BRISKIN: Objection to form.</p> <p>7 THE WITNESS: If -- if in that question</p> <p>8 you -- you mean to replace "directed" with "told,"</p> <p>9 then I don't recall one way or the other.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q I said that is what I mean by</p> <p>12 "directed," so I would like to get a clear answer</p> <p>13 to my question.</p> <p>14 A Sorry, I thought I was being -- being</p> <p>15 clear.</p> <p>16 Q There's no question pending.</p> <p>17 A Apologies.</p> <p>18 Q Did you see any evidence in this case</p> <p>19 that any FAA instructed their advertising agency</p> <p>20 to use Google products or services to purchase</p> <p>21 ads?</p> <p>22 MR. BRISKIN: Objection to form.</p>	<p style="text-align: right;">Page 81</p> <p>1 MR. BRISKIN: Objection to form.</p> <p>2 THE WITNESS: Could you -- one -- one</p> <p>3 more time. Sorry.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q Did you see any evidence in this case</p> <p>6 that any FAA instructed their advertising agency</p> <p>7 to use Google products or services to purchase</p> <p>8 ads?</p> <p>9 MR. BRISKIN: Objection to form.</p> <p>10 THE WITNESS: Sorry, I -- I just want to</p> <p>11 be clear. Again, it's -- it's the -- it's the FAA</p> <p>12 is purchasing ads and -- and so -- so I think my</p> <p>13 answer is the -- again, I'm not sure how that</p> <p>14 question is different from your previous question,</p> <p>15 which -- which I understand you to mean did I see</p> <p>16 any evidence in this matter where the -- where an</p> <p>17 FAA told an ad agency to use Google with regard to</p> <p>18 the FAAs' purchase -- purchases of Google's</p> <p>19 services.</p> <p>20 And my -- so my answer would be that,</p> <p>21 again, I've reviewed thousands of documents in</p> <p>22 this matter and I don't recall the -- the content</p>

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<p style="text-align: right;">Page 82</p> <p>1 of each and every one of them, so I may have seen</p> <p>2 something, I -- I may not. I -- I don't recall</p> <p>3 one way or the other. It was not something I</p> <p>4 focused on.</p> <p>5 MS. GOODMAN: Move to strike.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q It's accurate that the FAAs purchased</p> <p>8 display ads from Google using various ad agencies,</p> <p>9 correct?</p> <p>10 MR. BRISKIN: Objection to form.</p> <p>11 Oh, sorry.</p> <p>12 THE WITNESS: Yes.</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q Okay. The FAAs used the various ad</p> <p>15 agencies how to purchase ads from Google?</p> <p>16 MR. BRISKIN: Objection to form.</p> <p>17 THE WITNESS: I'm not sure what you mean</p> <p>18 by "how."</p> <p>19 BY MS. GOODMAN:</p> <p>20 Q How did the various ad agencies</p> <p>21 participate in the process of purchasing display</p> <p>22 ads from Google for the FAAs?</p>	<p style="text-align: right;">Page 84</p> <p>1 particular contract was to provide overall context</p> <p>2 to, for example, an FAA purchase pathway. It</p> <p>3 wasn't -- I wasn't focused on the -- I wasn't</p> <p>4 focused on what particular activities the -- the</p> <p>5 ad agencies did.</p> <p>6 Q Okay. So sitting here today, do you</p> <p>7 have any understanding of how the ad agencies</p> <p>8 participate in the process of purchasing display</p> <p>9 ads from Google for the FAAs?</p> <p>10 And I'm not asking for what your</p> <p>11 understanding is. I'm simply asking whether you</p> <p>12 have an understanding of how they participate.</p> <p>13 A The -- the ad agencies facilitate the</p> <p>14 FAAs' purchases.</p> <p>15 Q Okay. Do you know how the FAAs</p> <p>16 facilitate the ad agencies -- the FAAs' purchases?</p> <p>17 A Again, I didn't focus on exactly what</p> <p>18 activities they did.</p> <p>19 Q Okay. So do you have an understanding</p> <p>20 of how the ad agencies facilitate the FAAs'</p> <p>21 purchases?</p> <p>22 A I don't have a detailed understanding.</p>
<p style="text-align: right;">Page 83</p> <p>1 A So my work focused on the payment flow</p> <p>2 process. I wasn't focused on the -- I wasn't</p> <p>3 focused on exactly what the ad agencies did in</p> <p>4 facilitating the FAAs' purchases of Google</p> <p>5 services.</p> <p>6 Q Okay. Paragraph 44 of Appendix E, page</p> <p>7 17, the sentence I just read is from that and it</p> <p>8 cites to two documents in Exhibit 26 -- footnote</p> <p>9 26.</p> <p>10 Did you review those two documents cited</p> <p>11 in footnote 26?</p> <p>12 A Yes.</p> <p>13 Q Did you come away with an understanding</p> <p>14 of how the ad agencies participate in the process</p> <p>15 of purchasing display ads from Google?</p> <p>16 A So a couple of clarifications. The -- I</p> <p>17 know there are two Bates stamps in footnote 26. I</p> <p>18 think it's actually the same document.</p> <p>19 The -- the -- the document, as it's</p> <p>20 noted in the footnote, is a contract between the</p> <p>21 Air Force and GSD&M.</p> <p>22 I was focused on -- my review of this</p>	<p style="text-align: right;">Page 85</p> <p>1 Q Do you have an understanding?</p> <p>2 A Yes.</p> <p>3 Q What is your understanding of how the</p> <p>4 FA- -- how the ad agencies facilitate the FAAs'</p> <p>5 purchases?</p> <p>6 A The -- the FAAs facilitate the FAAs'</p> <p>7 purchases -- for example, I believe that --</p> <p>8 that -- that they're the ones that log in, so to</p> <p>9 speak, to Google Ads or DV360.</p> <p>10 Q And what is your understanding based on</p> <p>11 that the ad agencies are the ones who log in, so</p> <p>12 to speak, to Google Ads or DV360?</p> <p>13 A I -- I can't remember where I gained</p> <p>14 that understanding.</p> <p>15 Q Okay. And it is your understanding</p> <p>16 sitting here today that Google sends invoices to</p> <p>17 ad agencies, correct?</p> <p>18 A Yes.</p> <p>19 Q And it is your understanding sitting</p> <p>20 here today that Google -- that within your damages</p> <p>21 calculations Google only sends invoices to ad</p> <p>22 agencies, not directly to the FAA, correct?</p>

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<p style="text-align: right;">Page 86</p> <p>1 MR. BRISKIN: Objection to form.</p> <p>2 THE WITNESS: One more time, please.</p> <p>3 BY MS. GOODMAN:</p> <p>4 Q Within your damages calculations, the</p> <p>5 transactions within your damages calculations, is</p> <p>6 it accurate that for all of those purchases Google</p> <p>7 sent invoices to an ad agency, not to the FAA?</p> <p>8 MR. BRISKIN: Objection to form.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q And for all of the transactions within</p> <p>12 your damages calculations, did you see any</p> <p>13 evidence that an FAA transmitted money directly to</p> <p>14 Google?</p> <p>15 MR. BRISKIN: Objection to form.</p> <p>16 THE WITNESS: With regard to the payment</p> <p>17 flow process, what I saw is that the FAAs cut</p> <p>18 checks to the ad agencies and the ad agencies cut</p> <p>19 checks to Google such that --</p> <p>20 BY MS. GOODMAN:</p> <p>21 Q What evidence --</p> <p>22 A -- such that in the end the FAAs paid</p>	<p style="text-align: right;">Page 88</p> <p>1 from an advertising agency, not from the FAA, but</p> <p>2 evidence of an advertising agency paying money to</p> <p>3 Google? What payment data are you referring to?</p> <p>4 A Perhaps it would be helpful to -- let me</p> <p>5 just point that -- let me go to my Appendix E and</p> <p>6 I -- I will -- well, I will go there.</p> <p>7 So, for example --</p> <p>8 Q Can you -- I'm sorry to interrupt, but</p> <p>9 can you just identify what page you're looking at?</p> <p>10 A I'm in -- I'm on pages 158 and 159.</p> <p>11 Q Thank you.</p> <p>12 Go ahead.</p> <p>13 A So, for example, in the IPG MediaOcean</p> <p>14 data I saw evidence of cuts being check -- or</p> <p>15 checks being cut from an ad agency to Google.</p> <p>16 Q Okay. And is it accurate that for no</p> <p>17 other of the payment purchase pathways reflected</p> <p>18 in your Appendix E do you include any evidence</p> <p>19 that an ad agency cut a check to Google?</p> <p>20 A I'd -- I'd have to go through each and</p> <p>21 every one. I don't -- I don't recall specifically</p> <p>22 the -- there were many invoices and much payment</p>
<p style="text-align: right;">Page 87</p> <p>1 100 percent of the charges -- of Google's charges.</p> <p>2 Q What evidence did you see that ad</p> <p>3 agencies cut checks to Google?</p> <p>4 A That would be in my Appendix E to the</p> <p>5 opening report.</p> <p>6 Q What kinds of documents did you believe</p> <p>7 were sufficient evidence to form the belief that</p> <p>8 the ad agencies cut checks to Google?</p> <p>9 MR. BRISKIN: Objection to form.</p> <p>10 THE WITNESS: That's -- that's my</p> <p>11 understanding from the payment flow process.</p> <p>12 BY MS. GOODMAN:</p> <p>13 Q And I'm asking what kinds of documents</p> <p>14 is your understanding based on. I'm not asking</p> <p>15 for a specific document, but what kinds of things</p> <p>16 did you see that lead you to believe the -- or</p> <p>17 leads you to the opinion that the ad agency cut a</p> <p>18 check to Google?</p> <p>19 A Is -- it would be, for example, the</p> <p>20 payment data and invoices that are listed in</p> <p>21 Appendix E.</p> <p>22 Q What payment data did you see from an --</p>	<p style="text-align: right;">Page 89</p> <p>1 data that I looked at. I just don't recall</p> <p>2 specifically --</p> <p>3 Q Okay.</p> <p>4 A -- in terms of -- I -- I recall on --</p> <p>5 for USPS we got a quite fulsome dataset, but I</p> <p>6 just -- I just don't recall specifically with</p> <p>7 regard to other pathways.</p> <p>8 Q If you saw payment data showing payments</p> <p>9 from an advertising agency to Google, would that</p> <p>10 be reflected in your Appendix E?</p> <p>11 MR. BRISKIN: Objection to form.</p> <p>12 THE WITNESS: It would be reflected in</p> <p>13 my Documents Relied Upon list, the documents that</p> <p>14 I relied upon.</p> <p>15 BY MS. GOODMAN:</p> <p>16 Q But it wouldn't be in Appendix E?</p> <p>17 A Appendix E is a -- are examples of</p> <p>18 walk-throughs that I performed with regard to the</p> <p>19 payment process. Appendix E includes documents</p> <p>20 related to those walk-throughs. But it's possible</p> <p>21 that I saw additional payment data outside of</p> <p>22 Appendix E.</p>

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<p style="text-align: right;">Page 90</p> <p>1 Q And just for the record, when you say</p> <p>2 "Appendix E," you're talking about Appendix E to</p> <p>3 the initial Respress report, correct?</p> <p>4 A Yes.</p> <p>5 Q And Appendix E to your rebuttal report</p> <p>6 is, in fact, the initial Respress report, correct?</p> <p>7 A Corrected for errata.</p> <p>8 Q Yes.</p> <p>9 A Yes. It's rather confusing.</p> <p>10 Q Okay. So could we talk about Appendix E</p> <p>11 to the Respress report in this deposition as</p> <p>12 Appendix E/E so we know what we're talking about?</p> <p>13 A Wait, wait, wait, wait. What do you</p> <p>14 want to call it? Wait. Sorry?</p> <p>15 Q Withdrawn.</p> <p>16 MR. BRISKIN: Was that a joke? Appendix</p> <p>17 2.</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q Did you see any evidence in this case</p> <p>20 for purposes of your damages calculation that any</p> <p>21 FAA paid Google directly for the use of DV360?</p> <p>22 MR. BRISKIN: Objection to form.</p>	<p style="text-align: right;">Page 92</p> <p>1 BY MS. GOODMAN:</p> <p>2 Q May I --</p> <p>3 A -- US- --</p> <p>4 Q May I provide an understanding of -- let</p> <p>5 me tell you my understanding of "directly" and</p> <p>6 then maybe that will help you answer the question.</p> <p>7 A Okay.</p> <p>8 Q By "directly" I mean without the</p> <p>9 intervention of somebody -- of a medium or an</p> <p>10 agent.</p> <p>11 So did you see any evidence that any FAA</p> <p>12 paid Google directly for the use of DV360 for the</p> <p>13 transactions included in your damages</p> <p>14 calculations?</p> <p>15 MR. BRISKIN: Objection to form.</p> <p>16 THE WITNESS: Let me -- I'm not sure how</p> <p>17 that question is different from the questions you</p> <p>18 asked before in which I referred you to the IPG</p> <p>19 data for USPS.</p> <p>20 BY MS. GOODMAN:</p> <p>21 Q Okay. Let me try again.</p> <p>22 Did you see any evidence that any FAA</p>
<p style="text-align: right;">Page 91</p> <p>1 THE WITNESS: Sorry, are we talking</p> <p>2 about the FAA purchase pathways included in my</p> <p>3 damages analysis?</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q Yes, ma'am.</p> <p>6 MR. BRISKIN: Same objection.</p> <p>7 THE WITNESS: What I saw was that --</p> <p>8 again, what I saw was that Google invoiced ad</p> <p>9 agency, ad agency invoiced FAA, FAA cut a check to</p> <p>10 the ad -- ad agency, and ad agency cut a check to</p> <p>11 Google.</p> <p>12 BY MS. GOODMAN:</p> <p>13 Q Okay. And so is it your testimony that</p> <p>14 you did not see any evidence of Google paying</p> <p>15 money -- strike that. Withdrawn.</p> <p>16 Is it accurate that you did not see any</p> <p>17 evidence that any FAA paid money to Google</p> <p>18 directly for the use of DV360?</p> <p>19 MR. BRISKIN: Objection to form.</p> <p>20 THE WITNESS: Sorry, sorry, I'm not --</p> <p>21 I'm not sure what you mean by "directly," but we</p> <p>22 just discussed in --</p>	<p style="text-align: right;">Page 93</p> <p>1 paid Google without the intervention of a medium</p> <p>2 or an agent for the use of DV360 for the</p> <p>3 transactions included in your damages calculation?</p> <p>4 MR. BRISKIN: Objection to form.</p> <p>5 THE WITNESS: So, again, my</p> <p>6 understanding is that Google invoiced the ad</p> <p>7 agencies, the ad agencies invoiced the FAAs, the</p> <p>8 FAAs cut checks to the ad agencies, and the ad</p> <p>9 agencies cut checks to Google.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q So based on what you saw, is it accurate</p> <p>12 that the FAAs used a medium or an agent in order</p> <p>13 to pay Google?</p> <p>14 A I'm not sure what you mean by "medium"</p> <p>15 or "agent."</p> <p>16 The -- the payment process by which the</p> <p>17 FAAs paid for their Google purchases -- the</p> <p>18 payment process involves ad agencies.</p> <p>19 Q And the ad agencies are in between -- in</p> <p>20 that payment process they are in between Google</p> <p>21 and the FAA, correct?</p> <p>22 MR. BRISKIN: Objection to form.</p>

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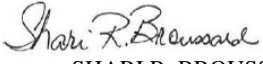
Page 94	Page 96
<p>1 THE WITNESS: Again, I'm not sure what</p> <p>2 you mean by "in between," but as I testified,</p> <p>3 Google invoices the ad agencies, ad agencies</p> <p>4 invoice the FAAs, FAA -- FAAs cut checks to the ad</p> <p>5 agencies, ad agencies cut checks to Google.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q Okay. I'm going to ask one more time</p> <p>8 just to see if you can answer the question as I've</p> <p>9 posed it. And if you can't, that's fine and I'll</p> <p>10 move to strike your answer and I'll call the</p> <p>11 court -- I'll bring this to the judge.</p> <p>12 But I'm asking a question to which</p> <p>13 you're not providing an answer and that is are the</p> <p>14 ad agencies in between the payment -- in the</p> <p>15 payment -- withdrawn.</p> <p>16 In the payment process which you have</p> <p>17 described, do the ad agencies sit in between</p> <p>18 Google and the FAA in order for Google to receive</p> <p>19 money from the FAA?</p> <p>20 MR. BRISKIN: Objection to form.</p> <p>21 THE WITNESS: Again, I -- I think I've</p> <p>22 explained my understanding of the process. I'm</p>	<p>1 would phrase it. I -- again, Google invoiced the</p> <p>2 ad agencies, ad agencies invoiced the FAAs, FAAs</p> <p>3 cut the checks to the ad agencies, ad agencies</p> <p>4 cut -- cut the checks to Google.</p> <p>5 MS. GOODMAN: Okay. I'll move to strike</p> <p>6 as nonresponsive.</p> <p>7 MR. BRISKIN: Can we take a quick break?</p> <p>8 MS. GOODMAN: Sure.</p> <p>9 VIDEO TECHNICIAN: Off the record at</p> <p>10 12:21.</p> <p>11 (Brief recess.)</p> <p>12 VIDEO TECHNICIAN: Back on the record at</p> <p>13 12:36.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q Ms. Lim, for every transaction that you</p> <p>16 include in the purchase pathways underlying your</p> <p>17 damages calculation, did you see any evidence that</p> <p>18 Google paid for the ads without the use of an ad</p> <p>19 agency? Withdrawn.</p> <p>20 For every transaction that you include</p> <p>21 in your purchase pathways underlying your damages</p> <p>22 calculations, did you see any evidence that the</p>
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<p>1 not sure what you mean by "sit in between," but I</p> <p>2 think I've been very clear that the -- Google</p> <p>3 invoices the ad agencies, ad agencies invoice the</p> <p>4 FAA, FAAs cut the checks to the ad agencies, ad</p> <p>5 agencies cut the checks to Google.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q And in the process which you have</p> <p>8 described --</p> <p>9 A I mean, I -- I -- that's the way that I</p> <p>10 would describe the process.</p> <p>11 Q Okay.</p> <p>12 A So -- sorry.</p> <p>13 Q In the process which you have described</p> <p>14 it is correct that the ad agencies are in between</p> <p>15 Google and the FAAs, correct?</p> <p>16 MR. BRISKIN: Objection to form.</p> <p>17 THE WITNESS: You seem really -- you</p> <p>18 seem really interested in "in between" and, again,</p> <p>19 I'm not sure what "in between" means with regard</p> <p>20 to your -- your question.</p> <p>21 The way the invoicing process works</p> <p>22 is -- is as I've explained it and that's the way I</p>	<p>1 FAA paid for the ads without the use of an ad</p> <p>2 agency?</p> <p>3 A No.</p> <p>4 Q You relied on data produced by Google</p> <p>5 which you refer to as RFP60 data, correct?</p> <p>6 A Yes.</p> <p>7 Q Did you understand that the RFP60 data</p> <p>8 includes advertiser names which are input by</p> <p>9 customers?</p> <p>10 MR. BRISKIN: Objection to form.</p> <p>11 THE WITNESS: May I review my report to</p> <p>12 refresh my memory with regard to that?</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q Sure. Which page of the report are you</p> <p>15 thinking of?</p> <p>16 A It's in the area of Figures 8 through</p> <p>17 10.</p> <p>18 So what I observed in the RFP60 data was</p> <p>19 there was some nonstandardization in terms of the</p> <p>20 information that was input into various fields</p> <p>21 that -- I'm not sure why there's</p> <p>22 nonstandardization -- non- -- nonstandardization.</p>

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<p>1 One reason could be because the -- the</p> <p>2 advertisers or the ad agencies assisting the</p> <p>3 advertisers could be putting in information into</p> <p>4 those fields in a nonstandard way.</p> <p>5 Q Did you have an understanding of the</p> <p>6 RFP60 data that the -- the information listed in</p> <p>7 the advertiser fields is not verified, curated, or</p> <p>8 cleaned by Google?</p> <p>9 MR. BRISKIN: Objection to form.</p> <p>10 THE WITNESS: I do not have an</p> <p>11 understanding of the process by which Google vets</p> <p>12 or doesn't vet the information that may be input</p> <p>13 either by Google or by others into its databases.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q Okay. Would it be important to you for</p> <p>16 purposes of your analysis to know whether the</p> <p>17 information for the advertiser identities within</p> <p>18 the RFP60 data is not verified, curated, or</p> <p>19 cleaned by Google?</p> <p>20 MR. BRISKIN: Objection to the form.</p> <p>21 THE WITNESS: Which field in particular</p> <p>22 are you talking about?</p>	<p>1 A Page 17? Sorry.</p> <p>2 Q Yes.</p> <p>3 Do you see paragraph 45?</p> <p>4 A I do.</p> <p>5 Q Okay. You write, "I identified FAAs in</p> <p>6 the RFP60 data and the TTD data and then</p> <p>7 identified specific combinations of FAAs and ad</p> <p>8 agencies."</p> <p>9 My question is what did you do to</p> <p>10 identify the FAAs in the RFP60 data?</p> <p>11 A So that's described in the rest of the</p> <p>12 paragraph.</p> <p>13 Q So you see a bunch of fields in the</p> <p>14 RFP60 data, and you referred to them as advertiser</p> <p>15 identifier variables, and then you used those</p> <p>16 variables to identify the FAAs.</p> <p>17 My question is how do you use the</p> <p>18 variables to identify the FAAs?</p> <p>19 MR. BRISKIN: Objection to form.</p> <p>20 THE WITNESS: So my process was that, as</p> <p>21 I described in my report, I first arrived at a --</p> <p>22 a bucket of advertisers with FAA-sounding words in</p>
Page 99	Page 101
<p>1 BY MS. GOODMAN:</p> <p>2 Q The fields listing the name of the</p> <p>3 advertiser customer.</p> <p>4 MR. BRISKIN: Objection to form.</p> <p>5 THE WITNESS: So the -- can you ask the</p> <p>6 question one more time? Sorry.</p> <p>7 BY MS. GOODMAN:</p> <p>8 Q Would it be important for you to know</p> <p>9 that the -- the fields including names of the</p> <p>10 advertising customer in RFP60 data is not</p> <p>11 verified, curated, or cleaned by Google?</p> <p>12 MR. BRISKIN: Objection to the form.</p> <p>13 THE WITNESS: The -- the -- no.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q Why not?</p> <p>16 MR. BRISKIN: Same objection.</p> <p>17 THE WITNESS: I didn't need to focus on</p> <p>18 the process of Google vetting information in the</p> <p>19 advertiser field.</p> <p>20 BY MS. GOODMAN:</p> <p>21 Q In paragraph 45 of Appendix E on page 17</p> <p>22 of the Respass initial report --</p>	<p>1 the advertiser identifier variables, and -- and</p> <p>2 this is described in my footnote 28, and I then</p> <p>3 limited my damages analysis to advertiser</p> <p>4 identi- -- identifier variables and, in fact, FAA</p> <p>5 purchase pathways, which I understand the United</p> <p>6 States is seeking damages for.</p> <p>7 BY MS. GOODMAN:</p> <p>8 Q Okay. So are the advertiser identifier</p> <p>9 variables, which are within your purchase pathways</p> <p>10 and which are thus within your damages</p> <p>11 calculation, those were all identified by the</p> <p>12 United States; is that right?</p> <p>13 MR. BRISKIN: Objection to form.</p> <p>14 THE WITNESS: I'm not -- I'm not sure I</p> <p>15 would quite phrase it that way. Let me -- let me</p> <p>16 try again.</p> <p>17 So I reviewed the RFP60 database and I</p> <p>18 saw FAA-sounding words in the advertiser</p> <p>19 identifier variables and -- and then -- so that's</p> <p>20 like a bigger bucket -- and then the United States</p> <p>21 instructed me to limit my damages analysis to a</p> <p>22 smaller bucket of FAA purchase pathways.</p>

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<p style="text-align: right;">Page 318</p> <p>1 Q When you worked at Ernst & Young -- what</p> <p>2 time period did you work at Ernst & Young?</p> <p>3 A '95 through '98.</p> <p>4 Q Other than in this case, have you looked</p> <p>5 at Ernst & Young audit reports since -- over the</p> <p>6 time -- over the time period of 2015 to the</p> <p>7 present let's say? In the course of your work</p> <p>8 have you had occasion to look at EY audit reports?</p> <p>9 A For any company?</p> <p>10 Q Yes.</p> <p>11 A Audit opinions, yes.</p> <p>12 Q Okay. And in the course of your work on</p> <p>13 this case you do not disagree with anything that</p> <p>14 EY concluded as to the principal/agent</p> <p>15 determination that Google made, correct?</p> <p>16 MR. BRISKIN: Objection to form.</p> <p>17 THE WITNESS: I -- I don't agree or</p> <p>18 disagree with EY not taking exception to Google's</p> <p>19 treatment of itself as a principal in most of its</p> <p>20 transactions.</p> <p>21 BY MS. GOODMAN:</p> <p>22 Q Okay.</p>	<p style="text-align: right;">Page 320</p> <p>1 MS. GOODMAN: We just went back on the</p> <p>2 record and I just want to note for the record that</p> <p>3 I am reserving my rights to bring Ms. Lim back for</p> <p>4 additional questioning based on the filibustering,</p> <p>5 evasive answers, and nonresponsiveness to my</p> <p>6 questions. So I just wanted to state that for the</p> <p>7 record.</p> <p>8 MR. BRISKIN: Well, we dispute that. We</p> <p>9 don't agree with your characterizations.</p> <p>10 MS. GOODMAN: Okay. Thank you.</p> <p>11 (Whereupon, at 7:28 p.m., the</p> <p>12 deposition of ADORIA LIM</p> <p>13 was concluded.)</p> <p>14 * * * * *</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: right;">Page 319</p> <p>1 MR. BRISKIN: Counsel, we're at five</p> <p>2 minutes over seven hours.</p> <p>3 MS. GOODMAN: I have one more question</p> <p>4 if I may.</p> <p>5 MR. BRISKIN: Okay.</p> <p>6 MS. GOODMAN: Thanks.</p> <p>7 BY MS. GOODMAN:</p> <p>8 Q You do not recall reviewing or seeing</p> <p>9 testimony from representatives of the Navy in</p> <p>10 which they testified the only ad network or DSP</p> <p>11 that they ever used to buy open web display ads</p> <p>12 was The Trade Desk, correct?</p> <p>13 MR. BRISKIN: Objection to form.</p> <p>14 THE WITNESS: I -- I reviewed thousands</p> <p>15 of documents in this case. I -- I don't recall</p> <p>16 that one way or the other.</p> <p>17 MS. GOODMAN: Okay. I pass the witness.</p> <p>18 MR. BRISKIN: We have no questions.</p> <p>19 VIDEO TECHNICIAN: All right. If that's</p> <p>20 everything, off the record on February 29th, 2024</p> <p>21 at 7:28 p.m.</p> <p>22 (Discussion off the record.)</p>	<p style="text-align: right;">Page 321</p> <p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, SHARI R. BROUSSARD, the officer before</p> <p>3 whom the foregoing deposition was taken, do hereby</p> <p>4 certify that the witness whose testimony appears</p> <p>5 in the foregoing deposition was duly sworn by me;</p> <p>6 that the testimony of said witness was taken by me</p> <p>7 in stenotype and thereafter reduced to typewriting</p> <p>8 under my direction; that said deposition is a true</p> <p>9 record of the testimony given by said witness;</p> <p>10 that I am neither counsel for, related to, nor</p> <p>11 employed by any of the parties to the action in</p> <p>12 which this deposition was taken; and, further,</p> <p>13 that I am not a relative or employee of any</p> <p>14 counsel or attorney employed by the parties</p> <p>15 hereto, nor financially or otherwise interested in</p> <p>16 the outcome of this action.</p> <p>17</p> <p>18</p> <p>19 </p> <p>20 SHARI R. BROUSSARD</p> <p>21 Notary Public in and for the</p> <p>22 District of Columbia</p> <p>My commission expires:</p> <p>August 14, 2025</p>

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Page 322	Page 324
<p>1 ACKNOWLEDGEMENT</p> <p>2 OF DEPONENT</p> <p>3</p> <p>4 I, ADORIA LIM, do hereby acknowledge</p> <p>5</p> <p>6 I have read and examined the foregoing pages of</p> <p>7 testimony, and the same is a true, correct and</p> <p>8 complete transcription of the testimony given by</p> <p>9 me, and any changes or corrections, if any, appear</p> <p>10 in the attached errata sheet signed by me.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Date ADORIA LIM</p> <p>21</p> <p>22 Job No. CS6485261</p>	<p>1 United States, Et Al v. Google, LLC</p> <p>2 Adoria Lim (#6485261)</p> <p>3 ERRATA SHEET</p> <p>4 PAGE____ LINE____ CHANGE____</p> <p>5</p> <p>6 REASON____</p> <p>7 PAGE____ LINE____ CHANGE____</p> <p>8</p> <p>9 REASON____</p> <p>10 PAGE____ LINE____ CHANGE____</p> <p>11</p> <p>12 REASON____</p> <p>13 PAGE____ LINE____ CHANGE____</p> <p>14</p> <p>15 REASON____</p> <p>16 PAGE____ LINE____ CHANGE____</p> <p>17</p> <p>18 REASON____</p> <p>19 PAGE____ LINE____ CHANGE____</p> <p>20</p> <p>21 REASON____</p> <p>22</p> <p>23</p> <p>24 Adoria Lim Date</p> <p>25</p>
<p>Page 323</p> <p>1 Craig Briskin, Esq.</p> <p>2 Craig.Briskin@usdoj.gov</p> <p>3 March 4, 2024</p> <p>4 RE: United States, Et Al v. Google, LLC</p> <p>5 2/29/2024, Adoria Lim (#6485261)</p> <p>6 The above-referenced transcript is available for</p> <p>7 review.</p> <p>8 Within the applicable timeframe, the witness should</p> <p>9 read the testimony to verify its accuracy. If there are</p> <p>10 any changes, the witness should note those with the</p> <p>11 reason, on the attached Errata Sheet.</p> <p>12 The witness should sign the Acknowledgment of</p> <p>13 Deponent and Errata and return to the deposing attorney.</p> <p>14 Copies should be sent to all counsel, and to Veritext at</p> <p>15 erratas-cs@veritext.com</p> <p>16 Return completed errata within 30 days from</p> <p>17 receipt of testimony.</p> <p>18 If the witness fails to do so within the time</p> <p>19 allotted, the transcript may be used as if signed.</p> <p>20</p> <p>21</p> <p>22 Yours,</p> <p>23 Veritext Legal Solutions</p> <p>24</p> <p>25</p>	

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HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

ERRATA SHEET FOR THE TRANSCRIPT OF:

Deponent: Adoria Lim

Case Name: *United States et al v. Google LLC*, No. 1:23-cv-00108-LMB-JFA (E.D. Va.)

Deposition Date: February 29, 2024

CORRECTIONS:

Page	Line	Change or Correction	Reason
4	15	“Counsel will please identify yourselves” should read “Counsel will you please identify yourselves”	<i>Transcription Error</i>
5	10	“MR. GRIFFIN: John Griffin, financial” should read “MR. GRIFFIN: John Griffin, I’m a financial”	<i>Transcription Error</i>
11	15	“of that list and that would be Zoi Fairlie. Last” should read “of that list and that would be Zoe Fairlie. Last”	<i>Typo</i>
17	1	“matter, meaning from the spring of 2023 to the” should read “matter, meaning from the spring of 2023 to”	<i>Transcription Error</i>
17	11-12	“contents of the bills, I’m asking if she reviewed bills.” should read “contents of the bills, I’m asking if she reviews them. ”	<i>Transcription Error</i>
20	7	“so it’s not something I’m focused on” should read “so it’s not something I focused on”	<i>Transcription Error</i>
22	15	“report, you know, in which he quantified damages” should read “report, in which he quantified damages.”	<i>Transcription Error</i>
23	22	“ Q When you were -- withdrawn.” should read “Q When you were -- never mind -- withdrawn.”	<i>Transcription Error</i>
30	16	“noted -- but a stand-alone digital advertising” should read “ loaded -- but a stand-alone digital advertising”	<i>Transcription Error</i>
66	18	“ it breaks out more binders and it shows the red” should read “it breaks out more buying doors and it shows the red”	<i>Transcription Error</i>
81	11-12	“be clear. Again, it's -- it's the -- it's the FAA is purchasing ads and -- and so -- so I think my” should read “be clear. Again, it's -- it's the -- it's the FAAs purchasing ads and -- and so -- so I think my”	<i>Transcription Error</i>
91	8	“again, what I saw was that Google invoiced ad” should read “again, what I saw was that Google invoiced the ad”	<i>Transcription Error</i>
92	21	“Q Okay. Let me try again.” should read “Q Okay. I’ll try again.”	<i>Transcription Error</i>
95	4	“FAA, FAAs cut the checks to the ad agencies, ad” should read “ FAAs , FAAs cut the checks to the ad agencies, ad”	<i>Transcription Error</i>
100	7	“Q Well, let's grab the question.” should read “Q I’ll withdraw the question.”	<i>Transcription Error</i>
123	16	“now.” should read “ 1:15 now.”	<i>Transcription Error</i>

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

134	16	“will answer the question.” should read “will answer your question.”	<i>Transcription Error</i>
146	14	“Kasolay (ph)?” should read “ Casale ?”	<i>Typo</i>
276	22	“Q Okay. You conducted a profitability” should read “Q Okay. You also conducted a profitability	<i>Transcription Error</i>
278	14	“Which page?” should read “ What page?”	<i>Transcription Error</i>

Date: _____ 3/29/2024 _____ Signature:  _____